

Guidelines

Origin and Authority Citations

What is a Citation to Origin and Authority?

A citation of origin and authority gives the rule number and section, or permit number, of the underlying applicable requirement for a permit condition. Each permit condition must contain a citation of origin and authority.

40 CFR 70.6(a)(1)(i) states, “The permit shall specify and reference the origin of and authority for each term or condition and identify any difference in form as compared to the applicable requirement upon which the term or condition is based.”

Why Review the Citations to Origin and Authority?

The citation is important because it provides the “**history**” of each condition, which:

- allows the source, inspectors, or permitting agencies to easily locate the underlying requirement for a permit condition to obtain more details on the requirement (which is why EPA recommends including details such as rule section and subsection in the citation)
- tells the permitting agency whether the permit condition can be amended, and if so, what procedures must be followed to amend the underlying applicable requirement before or in parallel with proposing the title V permit. (i.e., a title V permit condition originating from a SIP-approved permit can be changed only by following the appropriate permit amendment procedures to amend the underlying applicable requirement - see page 12 of White Paper #1)

How Do I Review the Citations to Origin and Authority?

When reviewing the citations to origin and authority,

- verify that **all** permit conditions include a reference to the origin and authority
- check to see whether the reference is **correct** (also refer to tips given below)
- refer to the **federal enforceability** section of this guidance for districts where the citation is used to denote whether or not a condition is federally enforceable

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Tips for Review of Citations

If the permit condition...	Then the citation...
...is added due to title V requirements, such as additional periodic monitoring or recordkeeping	...should be made to the permitting agency's approved title V rule.
...originates from a SIP-approved permit	...must cite either the SIP Rule under which the permit was issued or the current permit in which this requirement exists. (EPA would prefer if both citations are included.)
...covers multiple applicable requirements that have been streamlined into one permit condition	...should list all streamlined requirements.

When Reviewing Citations, Comment If...

Issue	Example/Explanation	Correction
The permit includes a condition with no citation listed .	Many permits contain periodic monitoring requirements beyond what is specified in the applicable requirement as a means of "gap filling". The permit may cite a SIP rule as the origin of a 10% opacity limit, but may fail to include a citation for the daily visual checks added to the permit as "gap filling" periodic monitoring.	Any "gap filling" periodic monitoring added to a permit should include a citation to the periodic monitoring section of the permitting authority's approved title V rules.